

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

DELAWARE TRUST COMPANY, as TCEH
First Lien Indenture Trustee,

Plaintiff,

-against-

WILMINGTON TRUST, N.A., as First Lien
Collateral Agent and First Lien
Administrative Agent,

Defendant.

Electronically Filed

Case No. 15-cv-02883 (PAE) (FM)

**NOTICE OF JOINT MOTION
TO TRANSFER VENUE**

PLEASE TAKE NOTICE that upon the accompanying Declaration of Zoe E. Shea, dated May 6, 2015 and the exhibits attached thereto, the Affirmation of Ronit Berkovich, dated May 6, 2015 and the exhibits attached thereto, J. Aron & Company, Morgan Stanley Capital Group Inc., and Titan Investment Holdings LP's Joint Memorandum of Law in Support of Their Motion to Transfer and in Opposition to Plaintiff's Motion for Remand dated May 6, 2015, and upon all other papers and proceedings herein, proposed intervenors J. Aron, Morgan Stanley Capital Group Inc., and Titan Investment Holdings LP will move this court before the Honorable Paul A. Engelmayer, at the Thurgood Marshall United States Courthouse, 40 Foley Square, New York, New York, 10007, on May 13, 2015 at 9:30 a.m., or as soon thereafter as counsel may be heard, for an order pursuant to 28 U.S.C. §§ 1404 and 1412 granting the proposed intervenors' joint motion to transfer this action to the United States District Court for the District of Delaware.

Dated: May 6, 2015

New York, NY

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